

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**RODERICK FREEMAN**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO.: 3:15cv589-DPJ-FKB**

**MANAGEMENT & TRAINING CORPORATION;  
MTC CORRECTIONS, LP;**

**OFFICER J. MCCONNELL, individually and in her  
official capacity; OFFICER HUNT, individually  
and in her official capacity; and JOHN AND JANE DOES, 1-5**

**DEFENDANTS**

**AFFIDAVIT OF RODERICK FREEMAN**

State of Mississippi

County of

Marshall

I, Roderick Freeman, having been duly sworn, state under oath that the following is true and correct:

1. I am the Plaintiff in this action.
2. I have read over the Statement I wrote out on March 7, 2015 and the ARP papers I filed, and they are true and correct to the best of my knowledge.
3. I have a seventh (7<sup>th</sup>) grade education.
4. MTC/MDOC officers Sgt Ruffin and Lt. Ricks instructed me on how to fill out the ARP form. I had just gotten out of the hospital and was on medication, but I recall that they had me to write the Statement which consists of three pages. They told me that I did not have to put everyone's name in the ARP form since they were in the statement. All I had to do was summarize things for the ARP form, since they had the statement too.

5. I was told to just talk about the incident. I did not understand that I needed to name MTC as a business or include any claims about what they did or did not do about hiring or training Officer McConnell.

Witnessed my signature this the 30 day of March, 2016.

  
RODERICK FREEMAN

Sworn to and subscribed before me, the undersigned authority in and for the jurisdiction aforesaid, on this the 1<sup>st</sup> ~~March~~ <sup>April</sup> day of ~~March~~, 2016.

  
Notary Public

My Commission Expires:

